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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

November 09, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

**CARLOS FAVIAN MARTINEZ,
a/k/a “Cuate,”
MARCO ANTONIO MEDINA,
RIGOBERTO BROWN,
PEDRO ANTONIO CALVILLO
HERNANDEZ,
ROBERTO GARCIA VILLARREAL,
a/k/a “Betin,”
MIGUEL HIPOLITO CABALLERO
AUPART,
SANDRA GUERRA MEDINA,
MIREYA MIRANDA,
DIEGO CEBALLOS-SOTO,
CARLOS YZAGUIRRE,
JUAN HECTOR RAMIREZ AVILA,
a/k/a “Juanito,” and
JOSE de JESUS TAPIA FERNANDEZ,**

Defendants.

CRIMINAL NO.

UNDER SEAL

4:22-cr-560

MOTION TO SEAL INDICTMENT

COMES NOW the United States of America, by and through its attorneys, Jennifer B. Lowery, United States Attorney for the Southern District of Texas, and Assistant United States Attorney Steven Mellin, and requests this court issue an order sealing the indictment, this motion and any order issued in response thereto, except for a sufficient number of certified copies to be disseminated to and maintained by the United States Attorney’s Office, the Department of Justice

Antitrust Division, the Department of Justice Organized Crime and Gang Section, the Department of Homeland Security, and the Federal Bureau of Investigation and to further provide for the automatic unsealing of the indictment as to each defendant upon his or her arrest.

In support of this motion, the United States advises the court that an indictment has been returned on November 9, 2022, charging the above named defendants in an eleven (11) count indictment, including a Conspiracy to fix prices and allocate the market and a conspiracy to monopolize, in violation of Title 15, United States Code, Sections 1 and 2, Conspiracy to extort victims and extortion of victims, in violation of Title 18, United States Code, Sections 1951, Conspiracy to engage in international money laundering, in violation of Title 18, United States Code, Section 1956, and money laundering, in violation of Title 18, United States Code, Section 1956. A warrant has been requested for the arrest of the defendants. The defendants are currently not in custody. Disclosure of the existence of this indictment in advance of the arrests of the defendants could result in the defendants fleeing to avoid prosecution, the destruction of potential evidence, and pose a threat to arresting agents or potential government witnesses.

For the reasons outlined above, the United States respectfully requests that this court issue an order sealing the indictment, this motion, and any order issued in response to this motion filed in this case, except for a sufficient number of certified copies to be disseminated to and maintained by the United States Attorney's Office, the Department of Justice Antitrust Division, the Department of Justice Organized Crime and Gang Section, the Department of Homeland Security,

and the Federal Bureau of Investigation, and to further provide for the automatic unsealing of the indictment as to each defendant upon his or her arrest.

Respectfully submitted on this the 9th day of November 2022.

JENNIFER B. LOWERY
UNITED STATES ATTORNEY

By: *Steven D. Mellin*
Steven D. Mellin
Assistant United States Attorney